City of Santa Fe Springs
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November 18, 2010

United States Environmental Protection Agency, Region 9
75 Hawthorne Street (SFD-7-1)
San Francisco, CA 94105

Attention: Ms. Lynda Deschambault, Remedial Project Manager

Subject: City of Santa Fe Springs Comments on the Proposed Plan for OU-2 Groundwater Contamination (Omega Chemical Corporation Superfund Site)

Dear Ms. Deschambault:

On behalf of the City Council for the City of Santa Fe Springs, I am submitting the following comments on the Proposed Plan for OU-2 Groundwater Contamination (Omega Chemical Corporation Superfund Site).

While the City of Santa Fe Springs supports the remediation of the Omega Plume and understands and agrees with EPA that the clean up process needs to begin as soon as possible, the City cannot fully support USEPA's Preferred Alternative No. 6 of plume wide extraction with drinking water end use. Despite EPA's assertion in the OU-2 Plan that contaminated water would be treated to meet Federal and State drinking water standards, we believe Alternative No. 6 will not be acceptable to the residents and businesses that receive water from the City of Santa Fe Springs without additional effort by EPA to educate and inform the general public about the way contaminated water would be treated. We have communicated our concern regarding public involvement to EPA in a separate letter; however EPA's response was that the public involvement effort was adequate and in accordance with standard protocol. We continue to disagree with that assertion for the following reasons:

1. The one and only meeting specifically scheduled and noticed by EPA for the purpose of receiving comments from the general public was held in the City of Whittier, despite the fact that the residents and businesses which will be most directly impacted by the ROD over the next 30+ years are located within the City of Santa Fe Springs.

2. Although the notice for the public meeting in Whittier was released in early August and notices were sent to the general public, the selection of August 31, 2010 for the one and only public meeting left very little time for residents and businesses to engage themselves on this issue. As a result of the low attendance at the meeting,

EPA has unfortunately concluded that the residents and businesses of our community are either not interested in the issue or are passively supportive of the Proposed OU-2 Plan. However, we believe public participation would have been much higher had the meeting been held in September and at a location in the City of Santa Fe Springs.

The City of Santa Fe Springs would support a hybrid of end uses such as Alternative No. 4, combined with Alternative No. 6 with consideration for a third end use of treated water for spreading purposes for aquifer recharge, such as Alternative No.5. It is our position that a hybrid of end uses may provide a more comprehensive benefit to the region as whole rather than a single end use of treated drinking water. The urgency to treat the plume and to protect the vulnerable drinking water aquifers that many potable wells draw from is of the utmost importance and the City of Santa Fe Springs would urge the USEPA to consider multiple end uses of the treated plume water when considering the Record of Decision (ROD).

Further comments for the USEPA consideration:

1. **Promoting High Water Quality Standards.** The concept of customers consuming from a drinking water source that was once contaminated by the Omega Plume is feasible only if the USEPA heavily promotes the fact that the Omega Plume water will be treated above and beyond current drinking water standards. It is understood by law, potable water must be treated to State Public Health Drinking Water Standards but, the negative perception of customers consuming once contaminated water should be met with an aggressive campaign promoting a high quality of water that exceeds all drinking water standards for consumption. The lack of addressing this issue is another reason the City of Santa Fe Springs will not support drinking water as an end-use for the Omega Plume.

2. **USEPA has No Plan to Keep the Potentially Responsible Parties (PRP) Engaged.** While the USEPA is aware of 140 Potentially Responsible Parties (PRP) for the Omega Plume, it has not engaged all 140 PRP to bring them on board with the USEPA's plan for plume remediation. There is no protocol in place to bring the PRP together and hold them accountable for the duration of the 30 year cleanup process. The USEPA should provide a plan to all Cities impacted by the Omega Plume reassuring the Cities that the PRP have all been identified, are aware of their responsibility in cleaning up the plume, and are to be engaged with the cleanup until the Plume is completely treated. At this time not engaging all of the PRP gives the impression that the USEPA has not thoroughly thought out a plan for each PRP with respect to plume cleanup. The Record of Decision (ROD) should hold all PRP accountable, state the role the PRP are to engage in, and lay out a time frame that indicates they are to be held accountable until the plume is completely cleaned up.

3. **The Omega Plume Data is Current as of 2007.** All of the Omega Plume data (depth of contamination, type of contamination, and location of leading edge of plume) that has been utilized by the USEPA dates back to 2007. If the plume's minimum traveling velocity of 540 feet/year (calculated by CH2M Hill, the USEPA's contractor) is calculated as of 2010, this would put the leading edge of the plume some 1,600 feet further south of Imperial Highway than shown in the OU-2 Plan. Further, there is no mention of the width of the plume potentially expanding as well. With that in mind, if the USEPA issues a ROD in 2010, staff is concerned that the decision may not reflect what the plume may require for proper clean up in 2010.

4. **The True Depth of the Omega Plume.** More comprehensive testing must be completed within the deeper aquifers to properly model the Omega Plume's parameters. Currently not enough data has been obtained to indicate if the Omega Plume has traveled to the deeper aquifers where most potable wells operate within the plumes traveling sphere of influence. Data utilized to model the Omega Plume has mostly been within the shallow aquifers and this data may only be accurate for the aquifers tested. We believe the plume may have traveled to deeper aquifers and therefore the model may not be accurate. With a potentially inaccurate plume model the Record of Decision (ROD) will not prepare the PRP to deal with the extra costs involved with treating water from deeper aquifers, and the time frame of 30 years may not be an accurate time frame for plume wide remediation. More testing must be completed and should be reflected within the (ROD).

5. **USEPA's Plan to Use Santa Fe Springs Reservoir No. 1.** Currently the City's reservoir is operated as a source of drinking water, to sustain system pressure, and fire suppression. Utilizing the reservoir as a mixing tank due to the biological treatment process within the preferred alternative would require an inflow of blended water at or near the same rate as the production rate of the OU-2 (1500 gpm). Currently, blending the treated Omega Plume water within the Santa Fe Springs reservoir may not be feasible with respect to currently system operations. Issuing a ROD for Alternative No. 6 that claims to use the City's reservoir is a premature decision without fully understanding the operations of the City Water System, and inquiring if the system is potentially available.

6. **Santa Fe Springs Well No. 4 is Not Within the USEPA's Plan for Treating the Omega Plume.** The USEPA preferred alternative for cleanup of the Omega Plume does not consider the use of the City's Well No. 4, located on Telegraph Road. This well logistically sits within the middle regions of the Omega Plume and potentially could be utilized as an extraction point. If not utilized, the casing and drilling design

of the well may negatively impact other aquifers by providing a conduit for constituents having a specific gravity heavier than water such as PCE and TCE. With the well in an extraction mode of operation, the draw-down from pumping may act as a hydraulic barrier and keep the contaminants from traveling into deeper aquifers. The well can be retrofitted with current technologies to provide plume extraction solely from the contaminated aquifers. The current land that Well No. 4 occupies is potentially large enough to provide for some measure of treatment structures that may be required.

The City of Santa Fe Springs appreciates the opportunity to provide comments on the Proposed OU-2 Plan. We recognize that the residents and businesses of our community will be impacted by the Record of Decision that will ultimately be adopted by the USEPA and ask that our concerns and comments be carefully considered before a final decision is made.

We recognize that the City of Santa Fe Springs has an obligation to assist the EPA and PRP with implementation of a containment strategy and look forward to working with the EPA to ensure that the best interests of the City of Santa Fe Springs is protected.

Should you have any questions regarding this letter, please contact Mr. Fred Latham, City Manager or Mr. Don Jensen, Director of Public Works, at (562) 868-0511.

Sincerely,

Betty Putnam

Betty Putnam
Mayor, City of Santa Fe Springs

xc: Congresswoman Grace Napolitano, 11627 East Telegraph Road, #100
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